

OCA's Comments following February 28, 2005 Technical Session, including Proposed Voltage Complaint Process

March 7, 2005

I. Revise Voltage Variation Range

RULES AS CURRENTLY DRAFTED

Puc 304.02, Voltage Variation, lists the various service voltage configurations and the upper and lower permissible limits that the utility must maintain at the utility's service terminals for each customer. Presently, the allowable range for residential customers is between 110 and 125. *See* Puc 304.02 (d)(1)(a). There are five exceptions to these limits: weather; infrequent fluctuations; low power factor operation of the customer's equipment; unbalanced operation of the customer's equipment; and failure or maintenance of equipment. *See* Puc 304.02 (h).

OCA's POSITION

The OCA supports the replacement of the current voltage variation range (110 - 125 volts) with the ANSI C84.1 Electric Power Systems and Equipment Voltage Ratings standard, which defines the normal operating range as 120 volts +/- 5 percent, or from 114 volts to 126 volts. This change is appropriate in light of the power requirements of new electronic and computer equipment. By narrowing the variation range, this change will improve overall power quality. Other New England States have adopted this standard or more stringent standards.

II. Redefine Voltage Complaint Process

RULES AS CURRENTLY DRAFTED

Utilities record and file with the PUC voltage data on the E-1 Quarterly Report on Voltage Complaint Tests form. *See*, Puc 304.03 (e) and Puc 308.01. As written, Puc 308.01 suggests an interpretation that the E-1 forms exist for the reporting of voltage complaints that have been followed by testing, not all voltage complaints. Consequently, in instances of voltage variations within the allowable limits, the utility is required to report its testing and the circumstances of its testing to the N.H. PUC. Additionally, in instances where testing is not done, voltage levels outside the allowable limits may go undetected.

OCA's POSITION

The OCA also requests consideration of the following voltage complaint process, which could replace Puc 304.03.

Voltage Levels Above and Below the Variation allowed by Puc 304.02

A "voltage complaint" means notice, whether written or oral, by a customer to a utility of circumstances or conditions that suggest or evidence, in the ordinary course of the industry, a voltage level above or below the voltage variation allowed by Puc 304.02.

A utility shall investigate all "voltage complaints."

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A utility's investigation shall include but not be limited to voltage measurement taken at the customer's meter. A utility's investigation may also include information and data collection by means other than mechanical measurement or other inquiry by the utility.

A utility shall make a finding of "founded" or "unfounded" upon the conclusion of its investigation. A utility shall communicate the finding to the customer in the same manner that the customer used to communicate the voltage complaint to the utility.

A utility shall report to the N.H. PUC all voltage complaints. A utility shall file a quarterly report on voltage complaints on form E-1. For founded and unfounded voltage complaints, the E-1 report shall include: the name of each complainant.... (*see* 308.01);... and, for founded voltage complaints, the E-1 report shall include a statement of the cause(s) of the irregular voltage level(s) and the steps taken by the utility to address and resolve the irregular voltage level(s).

III. Revise 308.01 to include additional information re founded voltage complaints

(c) For founded voltage complaints, the E-1 report shall include the following additional information:

- (1) A statement of the cause(s) of the irregular voltage level(s); and
- (2) The steps taken by the utility to address and resolve the irregular voltage level(s).